IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

)))	
) Civil Action No. 00 C 2189
)
	Hon. Joan B. Gottschall)))
)	

INTERNATIONAL INSURANCE COMPANY'S PETITION TO REVIVE JUDGMENT

Pursuant to Rule 69 of the Federal Rules of Civil Procedure, 735 ILCS 5/2-1602, and 735 ILCS 5/13-218, Judgment Creditor, International Insurance Company n/k/a TIG Insurance Company ("IIC"), by and through its attorneys, hereby petitions the Court to revive the judgment entered against Defendant, Caja Nacional de Ahorro y Seguro n/k/a The Republic of Argentina ("Caja"). In support of this motion, IIC states as follows:

- 1. On October 9, 2002, this Court entered judgment in favor of IIC and against Caja in the sum of \$2,276,637.09.
- 2. As of June 30, 2014, post-judgment interest at the statutory rate of 9% has accrued in the sum of \$2,403,752.
- 3. Accordingly, as of June 30, 2014, the judgment debt Caja owes to IIC is \$4,680,389.
- 4. The entry "of a reviving order should be a clerical task; all it entails is assurance that the judgment has not been vacated or marked satisfied since its rendition." *TDK Electronics Corp. v. Draiman*, 321 F.3d 677, 680 (7th Cir. 2003).
- 5. The judgment has not been vacated or satisfied. Caja has paid no amount in satisfaction of the judgment and is entitled to no credits.

WHEREFORE, Plaintiff respectfully requests that the judgment entered on October 9, 2002, be revived.

July 1, 2014

/s/ Joseph P. Noonan III_

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